REMARKS

In response to the Examiner's Office Action dated July 17, 2003, Applicant has amended Claims 1, 2, 8, 18, 27, 28 and 44 to more clearly point out the present inventive concept. Reconsideration and favorable action is respectfully requested.

Applicant has amended the Cross-Reference to Related Application section as suggested by the Examiner.

Various claims have been objected to for various informalities. Applicant has corrected these in the amended claims.

Claims 1-2 and 18 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Ioka*. This rejection is respectfully traversed with respect to the amended claims.

The present invention, as defined by the amended claims, is directed toward a statistical processing integrated circuit which includes on the integrated circuit both a data converter for receiving information in a first data domain and converting it to data in a second data domain. The statistical processing operation is carried out in the second data domain by a statistical processor. However, first, the data is collected and then this data is processed. Once processed, access is then allowed to the data from external to the chip.

The *Ioka* reference does not disclose the inclusion of the data converter and the statistical processor on the same integrated circuit. As such, Applicant believes that the *Ioka* reference does not fully anticipate the claims as amended and, therefore, respectfully requests withdrawal of the 35 U.S.C. §102(b) rejection thereto in view of the *Ioka* reference. However, the Examiner has also provided the *Favreau* reference and used it in rejecting claims 19-20 27-28, 44 under 35 U.S.C. § 103(a) by combining the *Ioka* reference in view of the *Favreau* reference. The *Favreau* reference is provided to show that the data converter is provided on the same integrated circuit as a DSP or a processor. The processor is further

noted by the Examiner as being an application specific processor. However, even if the *Favreau* reference were combined with the *Ioka* reference, it is the statistical processing operation performed on a single integrated circuit that contains the data converter that distinguishes Applicant's present inventive concept from these two references. Therefore, even considering that the Examiner would combine *Favreau* with *Ioka* to reject Claims 1, 2 and 18, Applicant believes that this combination of references would not be anticipatory or obviating, since there is no provision for collecting data, processing the collected data and then allowing external access.

Claims 19-20 were rejected by the Examiner under 35 U.S.C. § 103(a) as being unpatentable over *Ioka* in view of the *Favreau* reference. For the reasons described herein above, the *Favreau* reference is not believed to cure the deficiencies in *Ioka* in that neither of these references would anticipate the inclusion of a statistical processor on the integrated circuit in conjunction with the data conversion device operating as set forth in the claims. Therefore, Applicant respectfully requests withdrawal of the 35 U.S.C. § 103(a) rejection with respect to Claims 19-20.

Claims 27-28 and 44 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Intrater et al.* in view of *Ioka*. This rejection is respectfully traversed, since *Intrater et al.* does not cure the deficiencies noted herein above with respect to the *Ioka* reference. Again, the *Intrater et al.* does not disclose the use of a statistical processor or the specific aspects associated therewith. Therefore, Applicant respectfully requests withdrawal of the 35 U.S.C. § 103 rejection with respect to Claims 27-28 and 44.
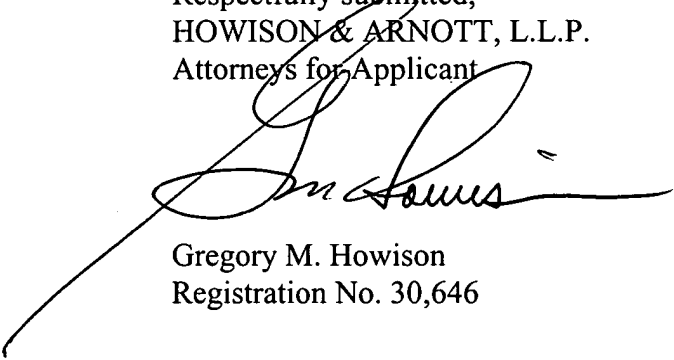
Neither *Ioka*, *Favreau*, or *Intrater*, taken singularly or in combination, obviate or anticipate Applicant's present inventive concept, as defined by the amended claims.

Claims 1-2, 18 and 27-28, 44 stand rejected under the judicially created doctrine of obviousness-double patenting as being unpatentable over Claims 18 and 20 in view of Patent No. 6,369,738. This rejection was made in view of *Ioka*. Applicant has attached a Terminal Disclaimer hereto. Therefore, Applicant believes that this overcomes this rejection.

Claims 1-2, 18 and 27-28, 44 are provisionally rejected under the judicially created doctrine of obviousness-double patenting as being unpatentable over Claim 1 of co-pending application No. 09/376,761 in view of *Ioka*. Applicant will consider filing a terminal disclaimer in the event that claims of a similar nature are issued in this case.

Applicant has now made an earnest attempt in order to place this case in condition for allowance. For the reasons stated above, Applicant respectfully requests full allowance of the claims as amended. Please charge any additional fees or deficiencies in fees or credit any overpayment to Deposit Account No. 20-0780/HCAI-24,805 of HOWISON & ARNOTT, L.L.P.

Respectfully submitted,
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